

OOC MEETING WITH EPA REGION 6
2017 GMG290000 PERMIT RENEWAL
MEETING AGENDA
MAY 3, 2016 (1:00-3:00PM)

b(5)

- I. Introductions
- II. Meeting Purpose and Overview
- III. Discussion on OOC Initial Recommended Changes
 - a. Comment 1 – 60-day submittal as opposed to 30 for DMRS
 - b. Comment 7 – Crude Oil Standard
 - c. Comment 13 – Excess cement slurry used for testing equipment discharge
 - d. Comment 15 – Inclusion of electrically generated Copper, Iron and Aluminum as exempt from toxicity testing requirement in chemically treated misc. discharges
 - e. Comment 18 – Removal of entrainment monitoring/sampling requirement
 - f. Comment 19 – Reduction of visual or remote inspections to quarterly
 - g. Additional EPA Clarifications or Questions
- IV. Update on Produced Water/ WBM Characterization Study Results
- V. Discussion on EPA Potential Changes Discussed During Last Meeting in October 2015
 - a. eNOI - Resubmittal under new permit
 - b. Visual Sheen Observation - Frequency increase
 - c. Sanitary MSD Exemptions – Removing from the permit
 - d. Produced Water - Requiring all produced water discharges to retest based on flow at permit renewal
 - e. Misc. Discharges – Breaking into sub-discharge categories with different limits
 - f. Pipeline Brines – Toxicity testing
 - g. De Minimis discharges – Adding acceptable list in permit
 - h. Fracking Fluids - Require toxicity testing
 - i. Produced water sampling – address list of what can and cannot do when sampling
 - j. Subsea discharges - require toxicity testing
 - k. Additional new potential items considering
- VI. Permit Renewal Process Moving Forward
 - a. Pre-Draft Permit timing?
 - b. OOC workgroup review of pre-draft?